

SUSMAN GODFREY L.L.P.

A REGISTERED LIMITED LIABILITY PARTNERSHIP

SUITE 5100

1000 LOUISIANA STREET

HOUSTON, TEXAS 77002-5096

(713) 651-9366

FAX (713) 654-6666

WWW.SUSMANGODFREY.COM

SUITE 1400
1900 AVENUE OF THE STARS
LOS ANGELES, CALIFORNIA 90067-6029
(310) 789-3100

SUITE 3000
401 UNION STREET
SEATTLE, WASHINGTON 98101-2683
(206) 516-3880

ONE MANHATTAN WEST
NEW YORK, NEW YORK 10001-8602
(212) 336-8330

June 17, 2025

VIA ECF

Hon. Ona T. Wang
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

Re: In re: OpenAI Inc., Copyright Infringement Litigation, 25-md-3143 (SHS) (OTW)
This Document Relates To: All Actions

Dear Judge Wang:

Per the Court's May 29 Order (Dkt. 78), on behalf of all Parties, please see attached charts containing summaries of the discovery disputes for discussion at the upcoming June 25, 2025, conference. Exhibit A summarizes global case management matters relating to all parties (including all Plaintiffs). Exhibit B contains a chart summarizing the discovery disputes in the Class Cases, and Exhibit C contains a chart summarizing the discovery disputes in the News Cases.

Sincerely,

/s/Justin Nelson

Justin Nelson

/s/Davida Brook

Davida Brook